



February 7, 2019

VIA ECFS

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: Ex Parte Letter - CG Docket Nos. 13-24, 03-123

Dear Ms. Dortch:

MezmoCorp (dba InnoCaption) submits the following comments in response to the Draft Report and Order, Further Notice of Proposed Rulemaking, and Order in the above referenced proceedings which has been circulated for tentative consideration by the Commission at the upcoming open meeting.¹

InnoCaption joins the other providers in asking the Commission to amend the Draft Item to permit the recovery of IP-CTS providers' exogenous costs associated with implementation of the TRS User Registration Database ("URD").²

InnoCaption believes reasonable costs associated with compliance, such as dedicated personnel or technical development, should be eligible for reimbursement given the upfront investment that will be required from providers, especially under the context of a further IP-CTS rate reduction this year. If these compliance costs are not reimbursed, they would represent an added overhead burden that negatively impacts smaller service providers to a greater extent than the rest of the marketplace.

¹ FCC-CIRC1901-04 (Jan. 3, 2019) ("Draft Item").

² See Ex Parte Filing of ClearCaptions, LLC, CG Docket Nos. 13-24, 03-123 (Errata filed Feb. 1, 2019); Ex Parte Filing of Hamilton Relay, Inc., CG Docket Nos. 13-24, 03-123 (RE: Ex Parte Presentation filed Feb. 7, 2019) ("Hamilton Filing").

Furthermore, InnoCaption also joins provider requests for the Commission to seek comment regarding the time required for the data submission period to ensure seamless transition of current user data.³

This notice is filed in accordance with Section 1.1206(b) of the Commission's rules.⁴

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Cristina O. Duarte', with a long horizontal line extending to the right.

Cristina O. Duarte
Director of Regulatory Affairs
MezmoCorp (dba InnoCaption)

CC via email: Eliot Greenwald
Michael Scott
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Jamie Susskind
Travis Litman
Arielle Roth
Randy Clarke

³ Hamilton Ex Parte Presentation, at 2

⁴ 47 C.F.R. § 1.1206(b).